

National Aeronautics and Space Administration  
Headquarters  
Washington, DC 20546-0001



October 16, 2007

Reply to Attn of: General Law Practice Group

TO: Distribution

FROM: Alternate Designated Agency Ethics Official

SUBJECT: Approval for Headquarters Employees with Senior Institutional or Project Responsibilities to Attend a Pre-launch Reception Co-sponsored by NASA Marshall Space Flight Center, ATK Launch Systems, Lockheed Martin Michoud Space Systems, and Pratt-Whitney Rocketdyne

In accordance with 5 C.F.R. § 2635.204(g)(2) and (3), I make the following determination:

Certain Headquarters employees with senior institutional or project responsibilities have been invited to attend a pre-launch reception co-sponsored by NASA Marshall Space Flight Center, ATK Launch Systems, Lockheed Martin Michoud Space Systems, and Pratt-Whitney Rocketdyne at the Doubletree Hotel Cocoa Beach, Florida, on or about Monday, October 22, 2007. This event is to be held in conjunction with the launch of STS-120, at the Kennedy Space Center.

This event will be a widely-attended gathering of aerospace industry representatives, members of Congress, NASA employees, and members of the public. The reception is valued at \$20 per person and approximately 350 individuals have been invited to attend. The reception is fully funded by contributions from the contractors with MSFC Office of Protocol providing oversight and management of the event. I find that the reception meets the requirements of a "widely attended gathering" as defined in 5 C.F.R. § 2635.204(g)(2).

ATK Launch Systems, Lockheed Martin Michoud Space Systems, and Pratt-Whitney Rocketdyne are contractor companies that are currently involved in the Space Shuttle program, and other significant contractual matters relating to NASA. Some NASA Headquarters personnel invited to attend this event presently, or may in the near future, have extensive involvement in matters relating to ATK Launch Systems, Lockheed Martin Michoud Space Systems, or Pratt-Whitney Rocketdyne's business interests.<sup>1</sup>

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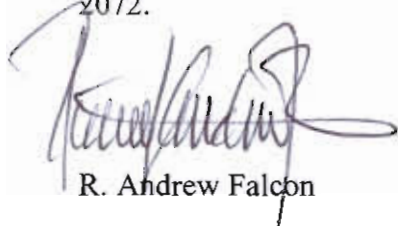
<sup>1</sup> These personnel include the Administrator, the Deputy Administrator, the Associate Administrator, the Chief of Staff, the White House Liaison/Deputy Chief of Staff, the Associate Administrator for ESMD, the Associate Administrator for PA&E, the Associate Administrator for SOMD, the Associate Administrator

I have determined that free attendance of these senior institutional and project leaders at the pre-launch reception is in the interests of the agency because it will further agency programs and operations. The attendance of these senior NASA employees at the event will help to raise NASA's profile with national and local business and governmental leaders, will contribute to community relations, and will support NASA's statutory mandate to disseminate information about its programs.

Given the purpose of the event, NASA's interest in it, the broad attendance anticipated, and the modest market value of the event, I have determined that the value to the agency in having these senior institutional and project leaders attend this event outweighs any concern that free attendance may or may appear to improperly influence them in the performance of their duties.

Accordingly, NASA employees in the positions identified above may accept free attendance at the event. They may also accept invitations for accompanying spouses or guests. Free attendance by employees whose duties do not affect the sponsor is addressed in a separate determination.

Questions about this determination may be addressed to Rebecca Gilchrist at 202-358-2072.



R. Andrew Falcon

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for ARMD, the Assistant Administrator for External Relations, the Assistant Administrator for the Office of Legislative Affairs, the Assistant Administrator for Public Affairs, the Assistant Administrator for the Office of Communications Planning, the Chief Safety and Mission Assurance Officer, the Chief Engineer, and the Chief Health and Medical Officer, the Inspector General, the General Counsel, the Chief Financial Officer, and the Associate Deputy Administrator for Institution and Management.